

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

MUR 3774

SUPPLEMENTAL RESPONSE OF NATIONAL RIGHT TO LIFE COMMITTEE, INC.

Comes now David N. O'Steen, under oath, on behalf of the National Right to Life Committee, Inc. and hereby responds to the Federal Election Commission's letter of April 24, 1997, requesting supplemental responses to the questions originally contained in the Commission's SUBPOENA TO PRODUCE DOCUMENTS and ORDER TO SUBMIT WRITTEN ANSWERS dated February 11, 1997.

In a letter of April 24, 1997, addressed to James Bopp, Jr., counsel to National Right to Life Committee, Inc., Dawn M. Odrowski, attorney for the FEC, requested additional information to supplement the response on NRLC dated April 10, 1997. In responding to each request, I have first summarized the request and then set forth my response thereto. All of the responses herein are given to the best of my knowledge, recollection and belief.

REQUEST: Produce, for each of the five named individuals, a list, by date, of all meetings or phone calls referenced on the 1992 and 1994 calendars or other such documents that involve the following persons or organizations and during which federal elections, federal candidates or NRSC contributions were discussed: (a) NRSC officers, directors, employees or agents, including but not limited to Jeb Hensarling, Senator Phil Gramm, Curt Anderson, Paul Curcio, William Harris and David Carney; (b) any 1992 federal candidates in 1992 and Rod Grams and Rick Santorum; (c) John Grotta; (d) Wes Anderson; (e) Coalitions for America and/or any of its officers, directors, employees or consultants including Eric Licht and Paul Weyrich; (f) the League of catholic Voters aka the American League of Catholic Voters and/or any officer, employee or director thereof; (g) Marice Rosenberg and (h) Jackie Schwietz.

RESPONSE: Heather Clapsaddle and Carol Long do not have calendars for 1992 and 1994. Darla St. Martin does not have a calendar for 1992. The remaining calendars have been consulted.

In responding to the request, no information is provided with respect to the portion of (b) which requests information

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concerning "any 1992 federal candidates in 1992" and with respect to (e) through (h) since no question with regards to them was asked in the Federal Election Commission's SUBPOENA TO PRODUCE DOCUMENTS and ORDER TO SUBMIT WRITTEN ANSWERS dated February 11, 1997. Furthermore, any information provided regarding any person who ever served as an officer, director, employee or agent of the NRSC is limited to the time period during which such persons were so affiliated, not before or after. Finally, NRLC declines to provide affidavits from persons who have not been subpoenaed.

The calendar of Darla St. Martin for 1994 reveals no information that is responsive to the request.

Jacki Ragan received a phone call on June 10, 1992, from Margaret Lauderback of the NRSC requesting that a meeting with Mike Huckabee be set up with Mike Huckabee, which occurred on June 23, 1992. Margaret Lauderback's title, address and phone number is unknown.

Calendars for the months of January, February, April and June of 1992 and March of 1993 for David O'Steen have already been provided to the FEC attached to the Supplemental Affidavit of David N. O'Steen dated February 27, 1996. Other than the months for which calendars have already been produced, the calendar of David O'Steen reveals that on February 3, 1994, David O'Steen, Carol Long and Doug Johnson, NRLC's Federal Legislative Director, met with members of Senator Gramm's staff. To the best of my memory, the meeting was with Gramm's U.S. Senate staff to discuss legislative matters, including health care reform. I do not recall whether or not Senator Gramm attended any portion of the meeting. John Cerisano, legislative assistant to Senator Gramm, 370 Russell Senate Office Building, Washington, D.C. 20510, 202-224-2934, may have attended. I do not recall if any other staff members may have attended. I do not recall the discussion of any federal election during the meeting.

REQUEST: Produce all bank statements for the bank account into which 1992 and 1994 checks from the NRSC were deposited (Account No. 6670042032 at the Signet Bank) covering the periods of September 1, 1992 through January 1, 1993 and September 1, 1994 through January 1, 1995. ^{amp}

RESPONSE: We object to providing the bank statements for bank account No. 6670042032 at the Signet Bank because they are not relevant to this matter and contain privileged information. However, subject to that objection, all bank statements for the

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bank account No. 6670042032 at the Signet Bank covering the periods of September 1, 1992 ^{through} ~~through~~ January 1, 1993 and September 1, 1994 ^{through} ~~through~~ January 1, 1995 are attached. However, bank account No. 6670042032 at the Signet Bank is not the account into which the 1992 and 1994 checks from the NRSC were deposited. The bank account statements for the accounts into which the NRSC checks were deposited have already been produced as Exhibit B to the Affidavit of David N. O'Steen dated September 29, 1995, and as Exhibit 4 to the Supplemental Affidavit of David N. O'Steen dated February 27, 1996, except for the bank statements for September, 1992, and September, 1994.

REQUEST: Regarding Interrogatory No. 4, identify persons at the following meetings: (a) the meeting at the Santorum campaign with whom David O'Steen met concerning the family cap proposal, (b) the persons at the Grams campaign with whom Marice Rosenberg met concerning Rod Grams' position on pro-life issues, and (c) the persons at the Grams campaign with whom David O'Steen and Darla St. Martin met concerning Rod Grams position on pro-life issues.

RESPONSE: With respect to (a), there was not a meeting "at the Santorum campaign." David O'Steen met with Congressman Santorum, himself, regarding the family cap proposal. Also attending the meeting were other members of Congress and representatives of interest groups. David O'Steen is not aware that any member of Santorum's campaign staff was present.

With respect to (b), other persons attending included Jackie Schwietz, Co-Executive Director of MCCL, 4249 Nicollet Avenue, Minneapolis, MN 55409, 612-825-6831, Peter Hong, currently Press Secretary for Senator Grams, 261 Dirksen Senate Office Building, Washington, D.C. 20510, 202-224-3244, and Sam, last name, title, and address unknown. If another person was present, their identity is unknown.

With respect to (c), this was not a meeting at the Grams campaign. Senator Rod Gramms and Chris Erikstrup, currently Administrative Assistant to Senator Grams, 261 Dirksen Senate Office Building, Washington, D.C. 20510, 202-224-3244, attended.

REQUEST: Identify Felicia Goeken.

RESPONSE: Voter Identification Project Coordinator, 412 Langdon, Alton, IL 62002, 618-465-3211.

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REQUEST: Specific source of each list for each program listed in Interrogatory 7.

RESPONSE: With respect to 7a, both NRLC and Georgia Right to Life, Mary Boyert, Executive Director, P.O. Box 81474, Atlanta, GA, 30366, 770-454-7612.

With respect to 7b, c and d, Pennsylvania Pro-Life Federation, 4800 Jonestown Road, #102, Harrisburg, PA 17109, 717-541-0034, Marianne Rempe, Executive Director.

With respect to the check to Optima Direct referred to in 7e, Minnesota Citizens Concerned for Life, Jackie Schwietz and Mary Schmit, Co-Executive Directors, 4249 Nicollet Ave, Minneapolis, MN 55409, 612-825-6831.

REQUEST: Please clarify the expenditures for the GOTV projects in Interrogatory 6. (a) Provide either a state by state breakdown of the cost of each GOTV project or invoices. (b) Clarify the payments to MDS.

RESPONSE: (a) Only MDS Communications provided NRLC with a complete breakdown of the cost of GOTV calls by state and race. The MDS Communications cost for the November 1994 GOTV calls are as follows: Pennsylvania Senate, \$8,243.20, Arizona Congressional District 1, \$2,499.20, and Arizona Congressional District 6, \$1,696.00. Thus, in the alternative, attached are invoices from Direct Connect, Infocision, Optima Direct, and Omega Communications.

(b) The amount paid to MDS communication for GOTV calls in 1994 is \$12,438.40, as shown on the copies of checks in Attachment F of Affidavit of David N. O'Steen dated September 29, 1995. The figure of \$2,649.60 reported to you in the Response of National Right to Life Committee, Inc. of April 10, 1997, was in error and it was apparently due to a miscalculation.

I, David N. O'Steen, being duly sworn, make the statements contained in this affidavit to the best of my personal knowledge, information and belief, under penalty of perjury.

David N. O'Steen

David N. O'Steen, Ph.D.

5/1, 1997

DISTRICT OF COLUMBIA)
 :
CITY OF WASHINGTON)

Before me, a Notary Public in and for said City and District, personally appeared David N. O'Steen, and acknowledged the execution of the foregoing instrument and made oath that the information provided therein was made to the best of his personal knowledge, information and belief, and, where based on information and belief, he believes the information to be true.

Witness my hand and notarial seal this 1ST day of

MAY, 1997.

Irene M. Gallon
Notary Public

My Commission Expires:

Irene M. Gallon
Notary Public, District of Columbia
My Commission Expires May 14 1998

_____, 19 ____.

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COMMITTEE, INC.



INFOCISION MANAGEMENT CORPORATION
325 Springside Drive, Akron, Ohio 44333
(216) 668-1400

Information/Decision Management

DAVID CIGSTEEN
NRLO
419 SEVENTH STREET, NW
SUITE 500
WASHINGTON DC. 20004

INVOICE : 33081
November 15, 1994
Revised 12/06/94

FULFILLMENT DIVISION

of
Units

Unit
Price

Sub
Total

Invoice for Telemarketing Services
Completed 11/02/94 through 11/08/94

NATIONAL RIGHT TO LIFE
Get Out The Vote NRLO467

Completed Calls	26103	0.50	13,051.50
Computer Tape Processing			322.62
Computer Tape Programming			21.25
Computer Tape Conversion			21.25
Training Hours	35	12.00	420.00

NET AMOUNT DUE THIS INVOICE \$13,836.62

PAYMENT IS DUE IN OUR OFFICE NO LATER THAN 14 DAYS FROM THE DATE OF THIS INVOICE. ANY PAYMENT NOT RECEIVED WITHIN 30 DAYS OF THE INVOICE DATE WILL INCUR A 1 1/2% MONTHLY FINANCE CHARGE, AND 1 1/2% EACH 30 DAYS THEREAFTER ON ANY OUTSTANDING BALANCE. PLEASE REMIT PAYMENT TO: INFOCISION MANAGEMENT



INFORMATION MANAGEMENT CORPORATION
325 Springside Drive, Akron, Ohio 44333
(216) 668-1400

Information/Decision Management

DAVID C. STEEN
NRLC
419 SEVENTH STREET, NW
SUITE 500
WASHINGTON DC. 20004

INVOICE # 83082
November 15, 1994
Revised 12/06/94

FULFILLMENT BY DATE	# of Units	Unit Price \$	Sub Total
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Invoice with Remarks: 11/15/94
Completed 11/02/94 through 11/08/94

NATIONAL RIGHT TO LIFE
Get Out The Vote NRLC468

Completed Calls	3367	0.50	1,683.50
Computer Tape Processing			50.00
Computer Tape Programming			21.25
Computer Tape Conversion			21.25
Training Hours	1.5	12.00	18.00

NET AMOUNT DUE THIS INVOICE	\$1,794.00
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PAYMENT IS DUE IN FULL WITHIN 10 DAYS FROM THE DATE OF THIS INVOICE. ANY PAYMENT NOT RECEIVED WITHIN 10 DAYS OF THE INVOICE DATE WILL INCUR A 1.0% MONTHLY FINANCE CHARGE, AND 1.0% EACH 10 DAYS THEREAFTER ON ANY OUTSTANDING BALANCE. PLEASE REMIT PAYMENT TO: INFORMATION MANAGEMENT



INFORMATION MANAGEMENT CORPORATION
325 Springside Drive, Akron, Ohio 44333
(216) 668-1400

Information/Decision Management

DAVID C. STEEN
NRLO
419 SEVENTH STREET, NW
SUITE 600
WASHINGTON DC, 20004

INVOICE : 33084
November 15, 1994
Revised 12/06/94

PERFORMANCE DIVISION

of
Units

Unit
Price

Sub
Total

Invoice for Telemarketing Services
Completed 11/02/94 through 11/08/94

NATIONAL RIGHT TO LIFE
Get Out The Vote NRLO470

Completed Calls	2462	0.50	1,231.00
Computer Tape Processing			50.00
Computer Tape Programming			21.25
Computer Tape Conversion			21.25

NET AMOUNT DUE THIS INVOICE \$1,323.50

PAYMENT IS DUE TO OUR OFFICE NO LATER THAN 15 DAYS FROM THE DATE OF THIS INVOICE. ANY PAYMENT NOT RECEIVED WITHIN 10 DAYS OF THE INVOICE DATE WILL INCUR A 1.2% MONTHLY FINANCE CHARGE, AND 1.2% EACH 10 DAYS THEREAFTER ON ANY OUTSTANDING BALANCE. PLEASE REMIT PAYMENT TO: INFORMATION MANAGEMENT



INFORMATION MANAGEMENT CORPORATION
325 Springside Drive, Akron, Ohio 44333
(216) 668-1400

DAVID C. STEEN
NRLO
419 SEVENTH STREET, NW
SUITE 600
WASHINGTON, DC 20004

Information/Decision Management

INVOICE # 03085
November 15, 1994
Revised 12/06/94

FILE ELEMENT D.V. 0.00

of
Lines

Unit
Price

Sub
Total

Invoice for Telemarketing Services
Completed 11/02/94 through 11/08/94

NATIONAL RIGHT TO LIFE
Get Out The vote NRLO471

Completed Calls	3958	0.50	1,979.00
Computer Tape Processing			56.29
Computer Tape Programming			21.25
Computer Tape Conversion			21.25

NET AMOUNT DUE THIS DATE \$2,077.79

PAYMENT DUE IN FOUR (4) DAYS AFTER 10 DAYS FROM THE DATE OF THIS
INVOICE. ANY PAYMENT NOT RECEIVED WITHIN 10 DAYS OF THE INVOICE DATE WILL
INCUR A 1.5% MONTHLY INTEREST CHARGE, AND 1.5% EACH 10 DAYS THEREAFTER
ON ANY OUTSTANDING BALANCE. PLEASE REMIT PAYMENT TO: INFORMATION MANAGEMENT



INFOCISION MANAGEMENT CORPORATION
325 Springside Drive, Akron, Ohio 44333
(216) 668-1400

Information/Decision Management

DAVID C. STEEN
NATIONAL RIGHT TO LIFE
419 17TH ST NW SUITE 500
WASHINGTON DC, 20004

INVOICE # 33398
December 13, 1994

TELEMARKETING DIVISION

of
Units

Unit
Price

Sub
Total

Invoice for Telemarketing Services
Completed 11/08/94

NATIONAL RIGHT TO LIFE
Get Out The Vote NRLO466

"Already Voted" Calls

525

0.24

126.00

NET AMOUNT DUE THIS INVOICE

\$126.00

PAYMENT DUE IN FULL MUST BE NO LATER THAN 10 DAYS FROM THE DATE OF THIS
INVOICE. ANY PAYMENT NOT RECEIVED WITHIN 10 DAYS OF THE INVOICE DATE WILL
INCUR A 1.2% MONTHLY FINANCE CHARGE, AND 1.2% EACH 10 DAYS THEREAFTER
ON ANY OUTSTANDING BALANCE. PLEASE REMIT PAYMENT TO: INFOCISION MANAGEMENT

Omega Communications, Inc.
Acacia Building #273
875 Greentree Road
Pittsburgh, PA 15220-3503
412-937-0730

Invoice

DATE

11/7/94

INVOICE #

1060

BILL TO:

National Right To Life Committee

419 7th Street NW
Washington D.C. 20004

P.O. NUMBER

TERMS

PROJECT

18505

NET 15

OM105

QUANTITY

DESCRIPTION

RATE

AMOUNT

18,177

Voter Education Calls

0.50

9,088.50

Billing Period: November 4 through November 7, 1994

TOTAL

9,088.50

Direct Connect. Inc.

5799 Broadmoor, Suite 114
Mission, KS 66202-3340
(913) 722-4145
(800) 766-2034

INVOICE

INVOICE DATE 11/21/94
INVOICE NO 000426

CUSTOMER NO NRTLCO
TERMS Due on Receipt
CUSTOMER ORD NO 941112

ATTENTION:

Nat'l Right to Life Committee
Attn: Carol Long
419 7th St., N.W., Suite 500
Washington, DC 20004

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PROJECT DESCRIPTION	CONTACTS	COST/CALL	AMOUNT
TELEMARKETING Iowa GOTV 11/06/94 - 11/07/94	50000	0.50	25000.00
TELEMARKETING Maryland GOTV 11/07/94 - gubernatorial race	14000	0.50	7000.00
TELEMARKETING Oregon GOTV 11/07/94 measure 16 state initiative/referendum	34000	0.50	17000.00

PAID IN FULL

AMOUNT IS NOT PAID IN FULL. DATE OF THIS INVOICE WILL BE CHARGED AT 1.5% PER MONTH.

TOTAL 49000.00